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9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 PAUL IZOR, individually and on behalf of all
13 others similarly situated, Plaintiff,

14 vs.

15 ABACUS DATA SYSTEMS INC., a California
16 corporation.

17 Defendant.
18

Case No. 4:19-cv-01057-HSG

Honorable Haywood S. Gilliam, Jr.

**STIPULATION TO CONSOLIDATE
FACT AND EXPERT DISCOVERY
DEADLINES; ORDER**

Complaint Filed: February 26, 2019

1 WHEREAS, on August 14, 2019, the Court issued its Scheduling Order (Dkt. #44), in
2 which it set January 17, 2020 as the Close of Fact Discovery and March 20, 2020 as the Close of
3 Expert Discovery;

4 WHEREAS, the parties have been and are continuing to diligently conduct discovery;

5 WHEREAS, the parties have scheduled mediation with Bruce Friedman of JAMS on
6 February 19, 2020 in Los Angeles;

7 WHEREAS, to focus on mediation related discovery, the parties stipulate to consolidating
8 the Close of Fact Discovery with the Close of Expert Discovery on March 20, 2020;

9 WHEREAS, in the event the case does not settle at mediation, consolidating the close of
10 fact and expert discovery would allow the parties to complete any remaining fact discovery;

11 WHEREAS, the Parties have not previously sought any modification of the Court's
12 Scheduling Order and the proposed modification would not affect other deadlines in the case
13 schedule.

14 IT IS HEREBY STIPULATED AND AGREED THAT:

15 The Close of Fact Discovery and the Close of Expert Discovery are consolidated to March
16 20, 2020, subject to the approval of the Court.

17 Respectfully submitted,

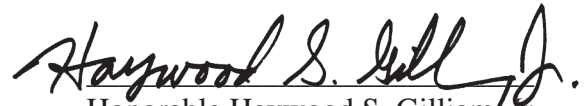
18 19 20 21	Dated: December 24, 2019	MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C. By: <u>/s/ Esteban Morales</u> Esteban Morales <i>Attorney for Defendant Abacus Data Systems, Inc.</i>
22 23 24	Dated: December 24, 2019	Kaufman P.A. By: <u>/s/ Avi R. Kaufman</u> Avi R. Kaufman <i>Attorney for Plaintiff Paul Izor</i>

1 **ORDER**

2 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

3 The deadline to complete fact and expert discovery is consolidated to March 20, 2020.

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5 ENTERED: 12/26/2019

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7 Honorable Haywood S. Gilliam, Jr.
8 U.S. District Court Judge
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